

It is disappointing that the Housing Enabling Team are not supporting this application. Paragraph 77 of the NPPF says: “*Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs*”. Paragraph 7 of the PPG “Housing needs of different groups” states: “*Local planning authorities can support opportunities to bring forward rural exception sites by working proactively with landowners*”.

This proposed development goes part of the way to fulfilling the need identified in the Stourton with Gasper Parish Housing Needs Survey produced by Wiltshire Council in December 2018

To take the objections in order, first:

- the proposed site is located outside of, and away from, the existing built area of Stourton, which is identified as a ‘Small Village’ in the Wiltshire Core Strategy. It does not therefore appear to meet criteria (iii) of CP44.

The application site was chosen following an assessment of various possible locations of which the site at Bonham was considered to be most appropriate being suitable/available and not isolated.

Stourton does not have a single “built area”. It is made up of a series of hamlets of which Bonham is one. Sited next to the existing houses and buildings at Bonham, the proposal is “*adjoining or well related to the existing settlement*”. It is worth noting that the NPPF para 79 merely requires: “*Planning policies and decisions should avoid the development of isolated homes in the countryside*”. This development is not isolated.

The second objection:

- The applicant proposes to retain Nomination Rights to the units which will be managed by a private landlord. This is contrary to the definition of ‘Affordable housing for Rent’ in Annex 2 of the NPPF which requires that the landlord is a Registered Provider.

The NPPF goes on to say: “... *except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider)*”.

We have informed the Housing Enabling Team that this is to be a Build to Rent scheme. They wish to ignore that on the basis that

no evidence has been provided as to how the proposed units meet the requirements of Build to Rent

We did not feel this was required. A Build to Rent scheme has certain requirements, which this scheme will meet. These requirements will need to be contained within a S.106 agreement. It is normal for the Council legal team to draft the agreement, not the applicant.

We understand the requirements and can readily comply with them. The NPPF definition of Build to Rent is:

*Purpose built housing that is typically 100% rented out. ... Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.*

- We currently manage over 20 let properties from our professionally run Estate Office. This includes four Affordable Rent homes built in 2016. While they were not a Build to Rent scheme, there are many similarities. A S.106 agreement ensures that these are Affordable in Perpetuity.
- All our existing tenancies are for a minimum of two years. Changing that to three is not an issue.
- Rent should be no more than 80% of market rent. At the last valuation, rents on our existing Affordable Homes were 71% of market rent.
- Tenants should be able to give one month's notice. This is standard in all our existing tenancies.
- The S.106 agreement should include a clawback mechanism should the homes cease to be Affordable Rental. We are very relaxed about that, as we believe that "Affordable in Perpetuity" should mean what it says.

The Housing Enabling Team also say:

we do not consider that Build to Rent is an appropriate tenure for a Rural Exception Site

There is nothing in the NPPF or PPG's to support this. While it is true that most schemes to date have been large urban developments, do you really want to exclude this valuable method of supplying affordable housing from rural areas?

The last objection:

- The proposed allocations criteria provided (attached) are not in accordance with the adopted Wiltshire Council Allocations Policy.

This is irrelevant to Build to Rent. The PPG on Build to Rent states:

*Authorities must take a reasonable position in negotiating occupancy criteria with build to rent developers, and eligibility should not constitute grounds for refusing planning permission.*

It goes on to say:

*Authorities should refrain from having direct nomination rights from their housing list.*

The proposed Allocation Policy is the same as that approved by the Council for our previous Affordable Housing, with the addition of some provision for tenants

requiring accessible accommodation. This proposal will provide affordable homes for local people in perpetuity at no cost to the state. It is entirely compatible with the NPPF and associated Guidance.